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## **JacksonLewis**

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October 7, 2021

## **VIA ECF**

Honorable Sarah Netburn United States Magistrate Judge Thurgood Marshall Courthouse 40 Foley Square, Room 430 New York, New York 10007

Re: Pang v. Cushman & Wakefield, et al. Case No. 1:20-cv-10019 (AJN) (SN)

Dear Judge Netburn:

Pursuant to Your Honor's direction at the September 17, 2021 conference, we write to confirm the scheduled dates for the depositions of Plaintiff Pro Se, and individual Defendants, Anthony Ye, Renae Stokke and William Carley. We wish to advise the Court that Plaintiff Pro Se and Philip Barber, Pro Bono counsel have confirmed to the undersigned that Mr. Barber will only be representing Plaintiff Pro Se at his deposition. Plaintiff Pro Se will be conducting the depositions of the individual Defendants. The below schedule allows ample time for Plaintiff Pro Se and counsel to review the responsive ESI produced by Defendants on September 24, 31 and October 4. The schedule also provides for a single day of deposition for each individual Defendant and Pro Se Plaintiff for:

- 1. Plaintiff Pro Se's deposition is scheduled for November 4, 2021;
- 2. Mr. Ye's deposition is scheduled for November 9, 2021;
- 3. Ms. Stokke's deposition is scheduled for November 10, 2021; and
- 4. Mr. Carley's deposition is scheduled for November 17, 2021.

Given the proposed deposition schedule, we would request that fact discovery be extended through November 30, 2021.

We thank the Court for its attention to this matter.

Respectfully submitted,

JACKSON LEWIS. P.C.

Mary A. Smith, Esq.

Mary.Smith@jacksonlewis.com

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cc: Ivan To Man Pang (via ECF, email and regular mail)

Caterina Catalano, Esq.

Phillip Barber, Esq. (Limited Scope Attorney for Plaintiff)

4824-1607-9614, v. 1

Defendant's motion for an extension of time to complete fact discovery is GRANTED. Fact discovery shall close on November 30, 2021. Any summary judgment motions shall be filed by December 30, 2021.

SO ORDERED.

SARAH NETBURN

United States Magistrate Judge

Dated: October 8, 2021

New York, New York